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1 Q. Does AZ-Tech Software distribute any products  
2 for Feitian in the United States?

3 MR. REEVES: I object to the question to  
4 the extent that it seeks information about  
5 distributing in the United States generally  
6 and is not limited to California or Delaware.

7 THE WITNESS: First, AZ-Tech Software,  
8 your question was not related to California  
9 and Delaware, so I do not want to answer.

10 Secondly, AZ-Tech is not a distributor.

11 BY MS. O'LAUGHLIN:

12 Q. Has AZ-Tech ever sold any products for  
13 Feitian in California?

14 A. The information I have now does not indicate  
15 that.

16 Q. Has AZ-Tech ever provided any services on  
17 behalf of Feitian to anyone California?

18 A. I'm not clear.

19 Q. Do you not understand the question?

20 A. My answer was the same as the answer to your  
21 previous question.

22 Q. What records did you check to see whether or  
23 not AZ-Tech has sold any products for Feitian in  
24 California or provided any services on behalf of

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1 Feitian in California?

2 A. They should alert me the information if there  
3 is information.

4 Q. Well, in preparing for today's deposition,  
5 did you review any information from AZ-Tech concerning  
6 contacts with California?

7 MR. REEVES: I object that the question  
8 assumes that there would be such information  
9 to review.

10 BY MS. O'LAUGHLIN:

11 Q. Would you answer the question, Mr. Li,  
12 please?

13 INTERPRETER # 3: Mr. Li would like me  
14 to interpret his lawyer's statement. Should  
15 I?

16 MR. REEVES: Yes.

17 MS. O'LAUGHLIN: Of course.

18 THE WITNESS: AZ-Tech is not in  
19 California; it's not in Delaware.

20 BY MS. O'LAUGHLIN:

21 Q. That's not my question, Mr. Li. My question  
22 is whether or not in preparing for the deposition you  
23 reviewed any records to see whether or not AZ-Tech had  
24 provided any services on behalf of Feitian or sold any

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1 products of Feitian in California?

2 A. Yes.

3 Q. What did you review?

4 A. The documents and the e-mails they exchange.

5 Q. When you say they exchange, do you mean

6 AZ-Tech and customers?

7 A. No. No. It's between AZ-Tech and U.S.

8 Q. Okay. And did you find any documents

9 indicating any sales or services by AZ-Tech in

10 California?

11 A. No, I did not find.

12 Q. What about any such documents concerning

13 sales or services in Delaware?

14 A. No.

15 Q. Okay. Has Feitian ever conducted any

16 customer surveys asking questions of customers in

17 California or Delaware?

18 A. No.

19 Q. At the RSA Conferences, did Feitian ever keep

20 a record of people who visited Feitian's booth?

21 A. No.

22 Q. How do you know that?

23 A. I have reviewed all the documents and

24 information. I did not found any.

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1 Q. Did you ask Mr. Liu if he kept a record of  
2 anyone who attended the booth at the 2006 RSA  
3 Conference that he attended?

4 A. Yes, I ask.

5 Q. And what did he say?

6 A. He said that he did not keep.

7 Q. Did you ask Mr. Liu what instructions he was  
8 given about the RSA Conference before he attended it?

9 A. Yes.

10 Q. And what instructions was he given?

11 A. Technology exchange.

12 Q. Was Mr. Liu asked to follow up with anyone  
13 that he met at the RSA Conference?

14 A. No.

15 Q. Do you know whether or not Mr. Liu had any  
16 communication with anyone he met at the RSA Conference  
17 once he returned from the RSA Conference?

18 A. He did not contact them voluntary.

19 Q. I don't understand.

20 INTERPRETER # 3: I think it means  
21 Mr. Liu did not contact them, them means  
22 those visit the booth, voluntary.

23 BY MS. O'LAUGHLIN:

24 Q. Voluntarily. Okay.

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1 Did anyone who attend -- did anyone  
2 communicate with Mr. Liu after the RSA Conference?

3 A. In the information I have currently I did not  
4 find this information.

5 Q. Did you ask Mr. Liu if anyone had been in  
6 touch with him after the RSA Conference?

7 A. Yes.

8 Q. What did he say?

9 A. No.

10 Q. Does Feitian pay the expenses for the  
11 employees that it sends to the RSA Conferences in  
12 California including the air fare and hotel and food  
13 expenses?

14 A. Yes.

15 Q. How much did it cost this year for expenses  
16 for the RSA Conference?

17 A. I don't know. We did not calculate.

18 Q. Did you keep track of the expenses in any  
19 way?

20 A. I think so.

21 Q. Did you look to see what those expenses were  
22 in preparing for the deposition?

23 A. No.

24 Q. Okay. Do you know what the expenses were for

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1 the 2003 and 2005 conferences, RSA Conferences?

2 MR. REEVES: I object to the relevance  
3 of this line of questioning that the amount  
4 of expenses they incurred doesn't have  
5 anything to do with their contacts pertaining  
6 to California or Delaware.

7 BY MS. O'LAUGHLIN:

8 Q. You can answer, Mr. Li.

9 INTERPRETER # 3: Mr. Li asked me to  
10 interpret his lawyer's statement. Okay?

11 MR. REEVES: Yes.

12 THE WITNESS: I think expenses has  
13 nothing to do with this case, so I did not  
14 look for the information.

15 BY MS. O'LAUGHLIN:

16 Q. Among the documents that you sent to your  
17 lawyer and that your lawyer produced to us is a  
18 checking list of samples to RSA bidding. It's a  
19 two-page document. It's been Bates stamped FT 00064  
20 and 65. Could you get those in front of you now,  
21 please, Mr. Li? I have a couple questions about them.

22 A. Okay.

23 Q. Okay. What is this document? What does it  
24 mean checking list of samples to RSA bidding? What

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1 does that mean?

2 A. It was for RSA Corporation, for RSA to  
3 introduce our corporation.

4 Q. At the RSA Conferences?

5 A. No. It has nothing to do with this  
6 conference.

7 Q. Who is RSA?

8 A. It's a U.S. corporation.

9 Q. Where is it located?

10 A. I'm not clear.

11 Q. Who prepared this checking list of samples to  
12 RSA bidding?

13 A. It's very possible it's prepared by Rachel  
14 Liu, but I'm not sure.

15 Q. And where is RSA located in the United  
16 States?

17 A. I do not know.

18 Q. What was the purpose of this document?

19 A. To introduce our products to them.

20 Q. In order to sell your products to RSA?

21 A. I said it was for technology exchange.

22 Q. Is it your testimony that everything that

23 Feitian does in the United States is only for

24 technology exchange, not for the purposes of sales or

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1 offering for sale your products?

2 A. Selling the product is the distributor's  
3 the -- selling the product should be done by the  
4 distributor.

5 Q. But is it your testimony that Feitian never  
6 sells its products directly?

7 A. No.

8 Q. So Feitian does sell its products directly?

9 A. Only when the original customer who contacted  
10 us -- this is a question I don't quite understand what  
11 is the origin of -- only when the customer of the  
12 distributor which directly contacted us then we sell.

13 Q. Do you know why the checking list of  
14 samplings to RSA bidding was introduced to us in  
15 response to our jurisdictional discovery requests?

16 A. Because it has something to do with RSA.

17 Q. The RSA Conference?

18 INTERPRETER # 3: I cannot hear him.

19 THE WITNESS: RSA computer.

20 MS. O'LAUGHLIN: Computer?

21 INTERPRETER # 3: Excuse me. It was  
22 prepared for RSA Corporation.

23 BY MS. O'LAUGHLIN:

24 Q. RSA Corporation.



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1 A. Correct.

2 Q. I don't understand that answer. My question  
3 is, do you know why this document was produced to  
4 Aladdin in response to its jurisdictional discovery  
5 request?

6 MR. REEVES: Well, let me just go ahead  
7 and interject an objection here that if  
8 you're asking him if we had any communication  
9 in explaining why we produced certain  
10 documents, then that's attorney/client  
11 privilege, and I object. I wouldn't expect  
12 him to know, but if he knows, he can answer.

13 MS. O'LAUGHLIN: Well, Matt, we can cut  
14 through this. Do you know why this document  
15 was introduced to us?

16 MR. REEVES: If you want to have a  
17 conversation with me about this production  
18 off the record, that's fine. But if you're  
19 asking him --

20 MS. O'LAUGHLIN: I'm not --

21 MR. REEVES: I produced things, and I  
22 object to attorney/client privilege, number  
23 one, and, two, I don't know how he would know  
24 that without revealing attorney/client

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1 privilege. If you want to talk to me about  
2 production off the record, that's fine.

3 MS. O'LAUGHLIN: I want on the record an  
4 understanding of what he knows about this  
5 document --

6 MR. REEVES: I think --

7 MS. O'LAUGHLIN: -- and what RSA is, and  
8 that's what I was trying to elicit because it  
9 was unclear from his testimony.

10 MR. REEVES: You weren't asking about  
11 the document. You were asking about why it  
12 was produced. If you want to ask him about  
13 the document, then that's fine.

14 BY MS. O'LAUGHLIN:

15 Q. Mr. Li, where did you find this document?

16 A. It's in the document folder.

17 Q. Whose document folder?

18 A. The folder which everyone has access to.

19 Q. But what information is kept in that folder?

20 A. It has nothing to do with this case.

21 Q. Yes, it does, Mr. Li. If you produced a

22 document that you got from the folder, I'm trying to

23 understand what the document -- what the purpose of the

24 document is?

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1 A. We think that this had something to do with  
2 the case, but we don't think it has nothing to do with  
3 the case. We can remove it and take it away.

4 Q. What do you think it has -- what does it have  
5 to do with Feitian's business in Delaware or  
6 California?

7 A. Originally, we thought the RSA Corporation is  
8 a California corporation because RSA Conference was  
9 held in California; however, they're not sure. Now I  
10 have to find out.

11 Q. Does Feitian ever give away free product to  
12 potential customers?

13 A. I'm not certain.

14 Q. Okay. Do you know whether or -- in preparing  
15 for today's deposition, did you check to see whether or  
16 not Feitian had ever provided a software developer kit  
17 to anyone in California or Delaware?

18 A. I did look, but I did not find any.

19 Q. Did you check to see if Feitian had any  
20 records concerning any shipments of product to Delaware  
21 or California in preparing for your deposition?

22 A. I looked, but I did not find any information.

23 Q. Where did you look?

24 INTERPRETER # 3: I cannot hear him.

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1 Mr. Li asked me to repeat the question.

2 THE WITNESS: I looked at all the  
3 information folders.

4 BY MS. O'LAUGHLIN:

5 Q. And are the information folders -- do you  
6 have shipping information folders?

7 A. Yes, the most recent one.

8 Q. Okay. Well, for the invoices that you did  
9 produce you didn't produce any shipping information for  
10 them. Do you have shipping information for the sales  
11 to Polywell Computers, Nuveon, and ICRCO and Susteen?

12 A. We do not have the shipping documents. We  
13 only have the documents number, and we informed the  
14 customer for them -- we informed the customer the  
15 number for them to get the product.

16 Q. How do you inform the customer of the number?

17 A. We make phone call or we send the mail.

18 Q. Okay. You didn't -- did you look to see  
19 whether there were any e-mails between Feitian and  
20 Susteen, Nuveon, Polywell Computers, and ICRCO for  
21 these sales?

22 A. I did not find.

23 MS. O'LAUGHLIN: Okay. Thank you.

24 Thank you, Interpreter.

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1 INTERPRETER # 3: Thank you, too. Okay.

2 Bye.

3 MR. REEVES: Are we off the record?

4 MS. O'LAUGHLIN: Yeah. We're done.

5 (Witness excused.)

6 (Deposition concluded at 2:00 a.m.)

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C E R T I F I C A T I O N

I, ELISABETTA L. ANDREINI,  
Professional Reporter and Notary Public, do  
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DATED:

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ELISABETTA L. ANDREINI

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Aladdin Knowledge Systems, Ltd.,	:	
Plaintiff,	:	
v.	:	CIVIL ACTION NO. 05-149 (GMS)
	:	
Feitian Technologies Co., Ltd., et al.,	:	
	:	
Defendants.	:	
_____	:	

**EXHIBIT I**  
**(RF Ideas documents regarding Feitian's  
California contacts)**

**FILED UNDER SEAL  
PURSUANT TO STIPULATED  
PROTECTIVE ORDER (D.I. 80)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Aladdin Knowledge Systems, Ltd.,	:	
Plaintiff,	:	
v.	:	CIVIL ACTION NO. 05-149 (GMS)
	:	
Feitian Technologies Co., Ltd., et al.,	:	
	:	
Defendants.	:	
	:	

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EXHIBIT J

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ALADDIN KNOWLEDGE SYSTEMS, LTD.,	§	
	§	
Plaintiff,	§	
	§	C.A. NO. 05-149-GMS
v.	§	
	§	
FEITIAN TECHNOLOGIES CO., LTD., et al.,	§	
	§	
Defendants.	§	

**FEITIAN TECHNOLOGIES CO., LTD.'S AND  
RS-COMPUTER'S AMENDED RESPONSES TO PLAINTIFF'S  
SECOND SET OF INTERROGATORIES ON JURISDICTIONAL ISSUES**

TO: Plaintiff, by and through its attorney of record, David S. Eagle, Patrick A. Costello of Klehr Harrison Harvey Branzburg & Ellers, LLP, 919 Market Street, Suite 1000, Wilmington DE 19801 and Michael K. Coran, Mary Ellen O'Laughlin, 260 South Broad Street, 4<sup>th</sup> Floor, Philadelphia, PA 19102-5003

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants, Feitian Technologies Co., Ltd. ("Feitian") and RS-Computer ("RSC") hereby respond to Plaintiff's Second Set of Interrogatories on Jurisdictional Issues as follows:

**General Objections**

Feitian objects to all requests to the extent they seek information outside the scope of discovery permitted by the Court's order of February 24, 2006, (D.I. 48) or outside California.

**INTERROGATORIES**

1. With regard to the contention in: (a) Feitian's response to Interrogatory Nos. 3, 19 and 22 of Plaintiff's First Set of Interrogatories on Jurisdictional Issues Directed o Defendant Feitian Technologies Co. Ltd.; and (b) Feitian's response to Request for Admission Nos. 5, 6 and 10 of Plaintiff's Request for Admissions on Jurisdictional Issues Directed to Defendant Feitian Technologies Co., Ltd., that Feitian has only received inquiries from Delaware "made by Plaintiff's attorneys in connection with this..." or "received from Plaintiff's attorney (collectively, "Contention"), providing the following:

a. State the basis for the Contention;

**ANSWER:** The emails identified themselves as coming from "klehr.com," which is the internet address for Plaintiff's attorneys.

b. Identify each inquiry from Delaware that is referred to in this Contention or that is the subject of this Contention;

**ANSWER:** All emails coming from "klehr.com."

c. Identify, by bates stamp number(s), any document produced by you or on your behalf that evidences the inquiry that is referred to in this Contention or that is the subject of this Contention;

**ANSWER:** FT 00004 – 00007.

d. Describe any investigation done by you or on your behalf regarding the Contention;

**ANSWER:** None.

e. Identify each person who participated in any investigation done by your or on your behalf regarding the Contention;

**ANSWER:** See, Answer 1(d).

f. Give a summary of the person's participation;

**ANSWER:** See, Answer 1(d).

g. Identify all documents relating to the person's participation.

**ANSWER:** See, Answer 1(d).

h. With regard to any communications, oral or written, relating to the Contention, provide the following:

(i) Identify each person involved in the communication;

**ANSWER:** See, Answer 1(d).

(ii) State the date of the communication;

**ANSWER:** See, Answer 1(d).

(iii) State the date of the communication;

**ANSWER:** See, Answer 1(d).

(iv) Give a summary of the communication;



**ANSWER:** See, Answer 1(d).

(v) Identify each document relating to the communication;

**ANSWER:** See, Answer 1(d).

2. With regard to the contention in: (a) RSC's response to Request for Admission Nos. 4 and 5 of Plaintiff's Request for Admissions on Jurisdictional Issues Directed to Defendant RS-Computer; and (b) RSC's response to Interrogatory Nos. 19 and 21 of Plaintiff's Interrogatories on Jurisdictional Issues Directed to Defendant RS-Computer, that RSC had "received inquiries from Plaintiff's counsel in connection with this litigation" and "has received no inquiries...from Delaware other than one or two inquiries from Aladdin's counsel," (collectively, "Contention"), provide the following:

a. State the basis for the Contention;

**ANSWER:** See, Answer 1(a)

b. Identify each inquiry from Delaware that is referred to in this Contention or that is the subject of this Contention;

**ANSWER:** See, Answer 1(b)

c. Identify, by bates stamp number(s), any document produced by you or on your behalf that evidences the inquiry that is referred to in this Contention or that is the subject of this Contention;

**ANSWER:** See, Answer 1(c)

d. Describe any investigation done by you or on your behalf regarding the Contention;

**ANSWER:** See, Answer 1(d).

e. Identify each person who participated in any investigation done by you or on your behalf regarding the Contention;

**ANSWER:** See, Answer 1(d).

f. Give a summary of the person's participation;

**ANSWER:** See, Answer 1(d).

g. Identify all documents relating to the person's participation;

**ANSWER:** See, Answer 1(d).



h. With regard to any communications, oral or written, relating to the Contention, provide the following:

(i) Identify each person involved in the communication;

ANSWER: See, Answer 1(d).

(ii) State the date of the communication;

ANSWER: See, Answer 1(d).

(iii) Give a summary of the communication;

ANSWER: See, Answer 1(d).

(iv) Identify each document relating to the communication.

ANSWER: See, Answer 1(d).

3. How is John Sloan related to or connected to Plaintiff's attorneys? [The inquiry from John Sloan is set forth in the documents previously produced and bates stamped FT 00002 and FT 00003].

ANSWER: This information is not in RSC or Feitian's possession.

4. What inquiry or investigation did you make to determine that John Sloan is connected to Plaintiff's counsel? [The inquiry from John Sloan is set forth in the documents previously produced and bates stamped FT 00002 and FT 00003].

ANSWER: None.

5. With regard to any inquiry or investigation described or identified in your response to the preceding Interrogatory (collectively, "Inquiry"), provide the following:

a. Identify each person who participated in the Inquiry;

ANSWER: See, Answer 4.

b. Give a summary of the person's participation;

ANSWER: See, Answer 4.

c. Identify all documents relating to the person's participation.

ANSWER: See, Answer 4.

d. With regard to any communications, oral or written, relating to the Inquiry, provide the following:

(i) Identify each person involved in the communication;

ANSWER: See, Answer 4.

(ii) State the date of the communication;

ANSWER: See, Answer 4.

(iii) Give a summary of the communication;

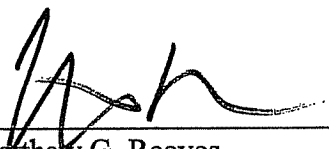
ANSWER: See, Answer 4.

(iv) Identify each document relating to the communication.

ANSWER: See, Answer 4.

LOCKE LIDDELL & SAPP LLP

Dated: September 22, 2006

  
\_\_\_\_\_  
Matthew G. Reeves

State Bar No. 00791498  
600 Travis, Suite 600  
Houston TX 77002-3095  
(713) 226-1200  
(713) 223-3717 (FAX)

*Attorneys for Defendant*  
Feitian Technologies, Ltd.

**CERTIFICATE OF SERVICE**

I also certify that copies of the foregoing were caused to be served on September 22, 2006, upon the following in the manner indicated:

Via U.S. Mail and Email

David S. Eagle – [deagle@klehr.com](mailto:deagle@klehr.com)

Patrick A. Costello – [pcostello@klehr.com](mailto:pcostello@klehr.com)

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919 Market Street, Suite 1000

Wilmington, DE 19801-3062

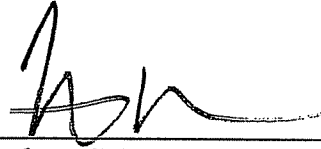
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Philadelphia PA 19102-5003



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Matthew G. Reeves

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Aladdin Knowledge Systems, Ltd.,	:	
Plaintiff,	:	
v.	:	CIVIL ACTION NO. 05-149 (GMS)
	:	
Feitian Technologies Co., Ltd., et al.,	:	
	:	
Defendants.	:	
<hr/>		

EXHIBIT K

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ALADDIN KNOWLEDGE SYSTEMS, LTD.,	§	
	§	
Plaintiff,	§	
	§	C.A. NO. 05-149-GMS
v.	§	
	§	
FEITIAN TECHNOLOGIES CO., LTD., et al.,	§	
	§	
Defendants.	§	

**DEFENDANT FEITIAN TECHNOLOGIES C O., LTD.'S  
SECOND AMENDED RESPONSES TO PLAINTIFF'S REQUEST  
FOR ADMISSIONS ON JURISDICTIONAL ISSUES**

TO: Plaintiff, by and through its attorney of record, David S. Eagle, Patrick A. Costello of Klehr Harrison Harvey Branzburg & Ellers, LLP, 919 Market Street, Suite 1000, Wilmington DE 19801 and Michael K. Coran, Mary Ellen O'Laughlin, 260 South Broad Street, 4<sup>th</sup> Floor, Philadelphia, PA 19102-5003

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendant Feitian Technologies Co., Ltd. ("Feitian") responds to Aladdin Knowledge Systems, Ltd.'s ("Plaintiff") Request for Admissions on Jurisdictional Issues as follows.

**GENERAL OBJECTIONS**

1. Feitian objects to the extent that any request for admission seeks discovery concerning attorney-client privileged or attorney work product information.
2. Feitian objects to the extent that any request for admission seeks discovery outside the limited subject of Feitian's alleged contacts with Delaware as permitted by the Court's opinion and discovery order (D.I. 48) or California.

**RESPONSES**

**REQUEST FOR ADMISSION NO. 1.:** Admit that Feitian's entered into an agreement with RF Ideas, Inc., t/a Security Tokens ("RF Ideas"), that allowed RF Ideas to distribute Feitian's products, including its "ePass" and "Rockey 4" and "Rockey 5" products in Delaware.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 2.:** Admit that Feitian's product named "ePass" has been offered for sale to residents of Delaware.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 3.:** Admit that Feitian's products known under the name "Rockey" have been offered for sale to residents of Delaware.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 4.:** Admit that Feitian operates an English-language interactive website from which a resident of Delaware could purchase Feitian's products, including "ePass" and "Rockey" products.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 5.:** Admit that Feitian has received inquiries concerning its "ePass" products from a resident of Delaware.

**ANSWER:**

Feitian admits that it is aware that Plaintiff's attorneys have sent inquiries to it in an apparent attempt to create a jurisdictional issue. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 6.:** Admit that Feitian has received inquiries concerning its "Rockey" products from a resident of Delaware.

**ANSWER:**

Feitian admits that it is aware that Plaintiff's attorneys have sent inquiries to it in an apparent attempt to create a jurisdictional issue. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 7.:** Admit that Feitian has made a sale of its "ePass" product to a resident of Delaware.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 8.:** Admit that Feitian has made a sale of its "Rockey" product to a resident of Delaware.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 9.:** Admit that one of the reasons Feitian has an interactive website in the English language is so that it can offer for sale, and sell, its "ePass" or "Rockey" products to residents of the United States of America.

**ANSWER:**

Feitian objects to this request as being outside the scope of the Court's order allowing "limited and appropriate jurisdictional discovery" concerning Feitian's contacts with Delaware or California, not the U.S. as a whole. Feitian objects to this request because it seeks irrelevant information related to contacts outside Delaware or California. Subject to the foregoing objections, Feitian admits that it has an English Language website to assist its English-speaking customers in the purchase of Feitian products. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 10.:** Admit that Feitian has received inquiries concerning its "ePass" or "Rockey" products from a resident of the United States.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 11.:** Admit that Feitian has made sales of its “ePass” or “Rockey” products in the United States.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 12.:** Admit that in 2004 residents of the United States purchased “ePass” or “Rockey” products manufactured by Feitian.

**ANSWER:**

Feitian objects to this request as being outside the scope of the Court’s order allowing “limited and appropriate jurisdictional discovery” as to Feitian’s contacts with Delaware or California, not the U.S. as a whole. Feitian objects to this request because it seeks irrelevant information related to contacts outside Delaware or California. Subject to the foregoing objections, Feitian admits that it has sold these products in the United States outside of Delaware. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 13.:** Admit that in 2005 residents of the United States purchased “ePass” or “Rockey” products manufactured by Feitian.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 14.:** Admit that in 2006 residents of the United States purchased “ePass” or “Rockey” products manufactured by Feitian.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 15.:** Admit that in 2005 more than 30% of Feitian’s exports were directed to the United States.



**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 16.:** Admit that in 2003 Feitian attended the RSA Conference in San Francisco, California.

**ANSWER:**

Feitian admits that it attended the RSA Conference in 2003. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 17.:** Admit that in 2003 Feitian had a booth at the RSA Conference in San Francisco, California.

**ANSWER:**

Feitian admits that it attended the RSA Conference in 2003. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 18.:** Admit that in 2003 Feitian distributed information about its products to attendees of the RSA Conference in San Francisco, California.

**ANSWER:**

Feitian admits that it attended the RSA Conference in 2003. Otherwise, Denied.

**REQUEST FOR ADMISSION NO. 19.:** Admit that in 2003 attendees of the RSA Conference in San Francisco, California included Delaware residents and representatives of Delaware corporations.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 20.:** Admit that in 2005 Feitian attended the RSA Conference in San Francisco, California.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 21.:** Admit that in 2005 Feitian had a booth at the RSA Conference in San Francisco, California.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 22.:** Admit that in 2005 Feitian distributed information about its products to attendees of the RSA Conference in San Francisco, California.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 23.:** Admit that in 2005 attendees of the RSA Conference in San Francisco, California included Delaware residents and representatives of Delaware corporations.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 24.:** Admit that in 2006 Feitian attended the RSA Conference in San Francisco, California.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 25.:** Admit that in 2006 Feitian had a booth at the RSA Conference in San Francisco, California.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 26.:** Admit that in 2006 Feitian distributed information about its products to attendees of the RSA Conference in San Francisco, California.

**ANSWER:**

Admit.

**REQUEST FOR ADMISSION NO. 27.:** Admit that in 2006 attendees of the RSA Conference in San Francisco, California included Delaware resident and representatives of Delaware corporations.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 28.:** Admit that you have offered your products for sale Feitian's at trade shows and trade conferences in the U.S. where attendees included Delaware residents and representatives of Delaware corporations.

**ANSWER:**

Denied.

**REQUEST FOR ADMISSION NO. 29.:** Admit that you did not stop offering for sale in Delaware your "ePass," "Rockey 4" and "Rockey 5" products after learning of the patents-in-suit.

**ANSWER:**

Feitian objects to this question as vague, ambiguous, argumentative and unfair. The question assumes that Feitian offered products for sale in Delaware regardless of how it is answered.

**REQUEST FOR ADMISSION NO. 30.:** Admit that you have entered into agreements that apply Delaware law or provide that they are governed by Delaware law.

**ANSWER:**

Denied

LOCKE LIDDELL & SAPP LLP

Dated: September 22, 2006



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*Attorneys for Defendant*  
Feitian Technologies, Ltd.

**CERTIFICATE OF SERVICE**

I also certify that copies of the foregoing were caused to be served on September 22, 2006, upon the following in the manner indicated:

Via U.S. Mail and Email

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Matthew G. Reeves